

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) LINDA K. VERGES	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-12-859-HE
	)	
(1) FIRST UNITED BANK AND TRUST,	)	
An Oklahoma Corporation,	)	
	)	
(2) SHANE PATTERSON,	)	
Both individually and	)	
In his official capacity,	)	
	)	
(3) WILLIAM FAHRENDORF,	)	
Both individually and	)	
In his official capacity,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION OF DEFENDANTS FIRST UNITED BANK AND TRUST  
COMPANY, SHANE PATTERSON AND WILLIAM FAHRENDORF FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants, First United Bank and Trust Company (“First United”), Shane Patterson and William Fahrendorf, by and through undersigned counsel, respectfully submit this unopposed motion for an extension of time in which to respond to the Complaint filed by Plaintiff, Linda K. Verges. In support of its motion, Defendant states as follows:

1. On August 7, 2012, Plaintiff filed its Complaint with the Clerk of the U. S. District Court for the Western District of Oklahoma.
2. Defendants were served with the Complaint on August 24, 2012, thus Defendants’ responses are due on or before September 14, 2012.

3. Due to the delay in counsel receiving the Complaint from clients and the time required to prepare an appropriate response to this litigation; the undersigned counsel respectfully requests this Court grant a fifteen (15) day extension of time to file Defendants' responses to the Summons and Complaint, to and including September 29, 2012.

4. Defendants' counsel has contacted Plaintiff's counsel, Leslie G. Sparks, who have authorized counsel to represent that he does not oppose this motion.

5. No prior requests for extensions of time have been made in this matter. Neither party will suffer prejudice as a result of this requested extension of time. There is no impact on any deadlines.

6. A proposed Order has been e-mailed to the Honorable Joe Heaton.

WHEREFORE, First United Bank and Trust Company, Shane Patterson and William Fahrendorf respectfully request that this Court grant an extension of time to file their responses to Plaintiff's Complaint and Summons until September 29, 2012.

Respectfully submitted,

s/ Heather Burrage

Heather Burrage, OBA No. 19423

**BURRAGE LAW FIRM**

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of the foregoing  
**UNOPPOSED MOTION OF FIRST UNITED BANK AND TRUST COMPANY,  
SHANE PATTERSON AND WILLIAM FAHRENDORF FOR EXTENSION OF  
TIME TO RESPOND TO SUMMONS** was filed electronically with the Court. Notice  
of this filing will be sent by operation of the Court's electronic filing system which will  
send notification of such filing to the following counsel of record for the Plaintiff:

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This 10<sup>th</sup> day of September, 2012.

s/Heather Burrage  
Heather Burrage